was separate and apart from her husband's interest therein." *Morrill* v. *Morrill,* 138 Mich. 112, was a case where the wife sought to restrain her husband from removing crops from land held by entirety. The court in discussing the bill remarked that "The only statute which it can be claimed has any bearing on this subject is our 'Married Woman's Act.' * * * I think it must be conceded that the decisions of this court have determined that this statute has no application to estates by entirety. See *Fisher* v. *Provin,* 25 Mich. 347; *Vinton* v. *Beamer,* 55 Mich. 559; *Speier* v. *Opfer,* 73 Mich. 35; *Naylor* v. *Minock,* 96 Mich. 182; *Dickey* v. *Converse,* 117 Mich. 449; *Doane* v. *Feather's Estate,* 119 Mich. 691. * * * Under our decisions, estates by entirety remain as at common law." Two New York cases, *Meeker* v. *Wright,* 76 N. Y. 262 and *Bertles* v. *Nunan,* 92 N. Y. 152, are sometimes cited as bearing upon the point decided in the principal case, but neither is in point. The first decided that a conveyance to husband and wife after the "Married Woman's Act" made them tenants in common, while the second overruled the first in that it decided that they took by entirety. The validity of a deed from husband to wife, when land is held by entirety, was not passed upon at all. The Michigan cases cited in this note establish two well defined propositions: 1st, that a conveyance to husband and wife makes them tenants by entirety, even after the "Married Woman's Act," and 2d, that estates by entirety remain as at common law. By the common law, on account of the fiction of unity, conveyances by husband to wife were void. *Ransom* v. *Ransom,* 30 Mich. 328; *Loomis* v. *Brusl,* 36 Mich. 40. The case of *Enyeart* v. *Kepler,* 118 Ind. 34, is cited in the principal case, and seems to support it, but the Indiana court arrives at its conclusion in a rather summary manner without the citation of a single authority. In view of the rather strict attitude of the Michigan court in holding that the estate by entirety is not a portion of the wife's separate estate (*Doane* v. *Feather's Estate,* 119 Mich. 691) and that the "Married Woman's Act" had not affected estates by the entirety and they remain as at common law (*Morrill* v. *Morrill,* 138 Mich. 112), and since at common law a conveyance from husband to wife was void, (*Ransom* v. *Ransom,* 30 Mich. 328) the principal case appears to take a long step in advance of the traditional views of that court on this point.

JUDGMENT—VACATING SATISFACTION.—A judgment creditor sold plaintiff's homestead under execution and bid it in for the full amount of his debt, and allowed the judgment to be satisfied of record. The sale was set aside under the exemption laws. *Held,* the creditor is not estopped from asserting that there was no satisfaction, and a new execution will issue. *Calhoun, Denny & Ewing* v. *Quinlan* (Wash. 1915), 150 Pac. 1132.

"Upon this question the authorities are clearly irreconcilable." FREEMAN, EX., § 54. There are courts, respectable in number and ability, which line up on the proposition. In South Carolina they hold that this is the common case of the application of the rule that there is no warranty at sheriff's sales, and that the rule *caveat emptor* applies. If a creditor bids in the property sold on execution, and the judgment is satisfied, he cannot be later heard to say otherwise, when the sale has been set aside because the property sold

was not the judgment debtor's, or was property protected by the exemption laws. *Jones* v. *Burr*, 5 Strob. 147, 53 Am. Dec. 699. In Pennsylvania the court arrived at the same conclusion upon the ground that the creditor, when he bids in property, takes upon him a risk which may lead to his disadvantage, but he does so at the premium of a reduced price. "Were it not for this risk, a creditor might safely depreciate the debtor's title, and buy it in at a sacrifice." *Freeman* v. *Caldwell*, 10 Watts (Pa.) 9. To the same effect, see *Vattier* v. *Lytle*, 6 Ohio St. 482; *Thomas* v. *Glazener*, 90 Ala. 537, 8 So. 153, 24 Am. St. Rep. 830; *Halcombe* v. *Loudermilk*, 3 Jones (N. C.) 491. But the weight of authority, and it seems of reason, is with the principal case. Satisfaction was set aside and new execution given where the sale was of exempt property, or the property of a stranger, in *Osborne* v. *Wilson*, 37 Minn. 8, 32 N. W. 786, 75 Am. Dec. 121; *Sturdivant* v. *Ward*, 90 Ark. 321, 134 Am. St. Rep. 32, (a four to three decision overruling the *caveat emptor* doctrine, in its application to this class of cases, in that state); *Hallon* v. *Hale*, 21 Tex. Civ. App. 194, 51 S. W. 900. In some states a remedy has been given by statute, CALIF. CODE CIV. PROC., § 708, *Cross* v. *Zane*, 47 Calif. 602, a case under that statute; TENNESSEE CODE, § 2900. But if a remedy is not given by statute, the purchaser is entitled to relief in equity against the debtor. *Warner* v. *Helm*, 1 Gilm. (Ill.) 220; *Price* v. *Boyd*, 1 Dana (Ky). 434. It would seem that "when the defendant has not lost, nor the plaintiff acquired, anything by the writ, it is not to be disputed that a new writ may and ought to issue." FREEMAN, EX., § 54. It is advantageous to the debtor himself, for it makes the property bring more nearly its real value, if the title of the purchaser is secured by such sale.

JURY—QUALIFICATION AS AFFECTED BY EMPLOYMENT BY CONNECTED CORPORATIONS.—Where, in an action brought against a mining company, it appeared that the X company owned about one-fifth of the capital stock in the defendant company and about the same amount of the stock in the Y company, that four of the directors of the defendant company were also directors of the X company, and that the general manager of the X company was also the general manager of the defendant company and of the Y company, with power to discharge any employé of any of the three companies. *Held*, it was not error for the trial court to disqualify employés of the X company and of the Y company from sitting as jurors. *Peklenk* v. *Isle Royale Copper Co.* (Mich. 1915), 153 N. W. 1068.

It has generally been held that employés of the parties to a suit are disqualified in law to serve as jurors. *The Central Railroad Co.* v. *Mitchell*, 63 Ga. 173; *Houston & T. C. R. Co.* v. *Smith*, 51 S. W. 506; *Hufnagle* v. *Delaware & H. Co.*, 227 Pa. 476, 76 Atl. 205. Error in not rejecting such an employé has been held to be ground for reversal. *Atlantic Coast Line R. Co.* v. *Bunn*, 2 Ga. App. 305, 58 S. E. 538; *Hubbard* v. *Rutledge*, 57 Miss. 7. But where the person or corporation employing the proposed juror is not a party to the suit, but is nevertheless interested as a corporate connection of a party, there is some conflict among the cases. Employment by a stockholder of a corporation which is a party to the suit has been regarded as no